

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF  
EASTERN DIVISION

NO

FILED

FIL

MAR 04 2025

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

Angela Shippert  
\_\_\_\_\_,

Plaintiff(s),

vs.

ILLINOIS STATE BOARD  
OF EDUCATION,  
\_\_\_\_\_

Defendant(s).

Case No. 25-50089

COMPLAINT FOR VIOLATION OF CONSTITUTIONAL RIGHTS

*This form complaint is designed to help you, as a pro se plaintiff, state your case in a clear manner. Please read the directions and the numbered paragraphs carefully. Some paragraphs may not apply to you. You may cross out paragraphs that do not apply to you. All references to "plaintiff" and "defendant" are stated in the singular but will apply to more than one plaintiff or defendant if that is the nature of the case.*

1. This is a claim for violation of plaintiff's civil rights as protected by the Constitution and laws of the United States under 42 U.S.C. §§ 1983, 1985, and 1986.
2. The court has jurisdiction under 28 U.S.C. §§ 1343 and 1367.
3. Plaintiff's full name is Angela Danielle Shippert.

*If there are additional plaintiffs, fill in the above information as to the first-named plaintiff and complete the information for each additional plaintiff on an extra sheet.*

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

4. Defendant, Illinois State Board of Education, is  
(name, badge number if known)

☐ an officer or official employed by \_\_\_\_\_;  
(department or agency of government)  
\_\_\_\_\_ or

☐ an individual not employed by a governmental entity.

*If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.*

5. The municipality, township or county under whose authority defendant officer or official acted is \_\_\_\_\_. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about \_\_\_\_\_, at approximately \_\_\_\_\_ ☐ a.m. ☐ p.m.  
(month, day, year)  
plaintiff was present in the municipality (or unincorporated area) of \_\_\_\_\_  
\_\_\_\_\_, in the County of \_\_\_\_\_,  
State of Illinois, at \_\_\_\_\_,  
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (*Place X in each box that applies*):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☐ searched plaintiff or his property without a warrant and without reasonable cause;
- ☐ used excessive force upon plaintiff;
- ☐ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☐ conspired together to violate one or more of plaintiff's civil rights;
- ☒ Other:  
See attached

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: (*Leave blank if no custom or policy is alleged*): \_\_\_\_\_

8. Plaintiff was charged with one or more crimes, specifically:

See attached

9. (*Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other"*) The criminal proceedings

☐ are still pending.

☐ were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.<sup>1</sup>

☐ Plaintiff was found guilty of one or more charges because defendant deprived me of a fair trial as follows \_\_\_\_\_

☒ Other: See attached

<sup>1</sup>Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

10. Plaintiff further alleges as follows: *(Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions and the actions of each defendant.)*

*See Attached*

11. Defendant acted knowingly, intentionally, willfully and maliciously.

12. As a result of defendant's conduct, plaintiff was injured as follows:

*See Attached*

13. Plaintiff asks that the case be tried by a jury. ☐ Yes ☒ No



[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

14. Plaintiff also claims violation of rights that may be protected by the laws of Illinois, such as false arrest, assault, battery, false imprisonment, malicious prosecution, conspiracy, and/or any other claim that may be supported by the allegations of this complaint.

**WHEREFORE**, plaintiff asks for the following relief:

- A. Damages to compensate for all bodily harm, emotional harm, pain and suffering, loss of income, loss of enjoyment of life, property damage and any other injuries inflicted by defendant;
- B. ☒ (Place X in box if you are seeking punitive damages.) Punitive damages against the individual defendant; and
- C. Such injunctive, declaratory, or other relief as may be appropriate, including attorney's fees and reasonable expenses as authorized by 42 U.S.C. § 1988.

Plaintiff's signature: Angela Shippert

Plaintiff's name (print clearly or type): Angela Shippert

Plaintiff's mailing address: 1531 IL Route 26

City Dixon State IL ZIP 61021

Plaintiff's telephone number: (641) 750-3450

Plaintiff's email address (if you prefer to be contacted by email): \_\_\_\_\_

angela.shippert@gmail.com

15. Plaintiff has previously filed a case in this district. ☐ Yes ☒ No

*If yes, please list the cases below.*

***Any additional plaintiffs must sign the complaint and provide the same information as the first plaintiff. An additional signature page may be added.***

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS ROCKFORD  
DIVISION

---

Angela Shippert, Plaintiff, v. ILLINOIS STATE BOARD OF EDUCATION, Defendant.

Case No.:

---

COMPLAINT FOR INJUNCTIVE RELIEF AND DECLARATORY JUDGMENT

Plaintiff, Angela Shippert, proceeding pro se, hereby files this Complaint for Injunctive Relief and Declaratory Judgment against the Illinois State Board of Education (ISBE), and alleges as follows:

I. JURISDICTION AND VENUE

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1331, as this case arises under the Constitution of the United States and involves the enforcement of federal law.
2. Venue is proper in this district under 28 U.S.C. § 1391 because Plaintiff resides in this district and the actions giving rise to the claims occurred in this district. The ISBE is located within the district and has a significant impact on education in the area.

II. PARTIES

3. Plaintiff: Angela Shippert, a taxpayer residing in the Northern District of Illinois, challenges the actions of the Illinois State Board of Education in continuing to enforce Diversity, Equity, and Inclusion (DEI) programs in Illinois schools despite the directives of Executive Order 14151, which mandates the termination of such programs in schools receiving federal funding.
4. Defendant: The Illinois State Board of Education (ISBE), a state agency responsible for overseeing public education in Illinois, is named as the defendant in this action. The ISBE has refused to comply with Executive Order 14151, which calls for the termination of DEI programs, policies, and positions in schools receiving federal funding.

III. FACTUAL ALLEGATIONS

5. On January 20, 2025, President Donald Trump issued Executive Order 14151, directing the termination of all diversity, equity, and inclusion (DEI) programs, policies, and mandates in federal agencies and in federally funded schools, including K-12 institutions.
6. The U.S. Department of Education sent a "Dear Colleague" letter to the Illinois State Board of Education earlier in January 2025, reminding the ISBE of its obligations under federal law.
7. Despite these federal mandates, Tony Sanders, the State Superintendent of the Illinois State Board of Education, has publicly stated that the ISBE will not cease DEI programs.
8. Sanders acknowledged that the federal government could potentially withdraw up to 10% of funding from Illinois school districts if the state does not comply with federal requirements.

9. Plaintiff, as a taxpayer, has been directly affected by ISBE's refusal to comply with federal mandates.

#### IV. CLAIMS FOR RELIEF

Count I – Violation of the Supremacy Clause of the United States Constitution 10. The refusal of the Illinois State Board of Education to comply with Executive Order 14151 constitutes a direct violation of the Supremacy Clause (Article VI, Clause 2) of the United States Constitution.

Count II – Violation of the First Amendment Rights of Students 11. The Illinois State Board of Education's DEI programs, rooted in Critical Race Theory, compel students to adopt specific ideological beliefs about race and justice, thereby infringing upon their First Amendment rights.

Count III – Violation of Title VI of the Civil Rights Act of 1964 12. By continuing to fund and promote DEI programs that preference certain racial groups, the Illinois State Board of Education is violating Title VI of the Civil Rights Act of 1964.

Count IV – Violation of the Worker Freedom of Speech Act 13. The Illinois State Board of Education's enforcement of DEI policies violates the Worker Freedom of Speech Act, which was put into effect on January 1, 2025, and protects employees and students from mandatory participation in employer-sponsored ideological programs.

#### V. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court:

1. Issue a declaratory judgment that the actions of the Illinois State Board of Education in continuing DEI programs in violation of Executive Order 14151 are unlawful.
2. Grant a permanent injunction compelling the Illinois State Board of Education to cease all DEI programs.
3. Order the Illinois State Board of Education to submit a compliance report within 30 days.
4. Award Plaintiff their costs of suit, and any other relief deemed just and proper.

Dated: February 28, 2025

Respectfully submitted,

Angela Shippert 1531 IL Route 26, Dixon, IL Phone: 641-750-3450 Email:  
[angela.shippert@gmail.com](mailto:angela.shippert@gmail.com)